



From: Anderson, Jon

Sent: Monday, May 12, 2025 1:22 PM

To: Shannon M. McNulty <smm@cliffordlaw.com>; Katherine Barrett Riley - MB/SF/HS/DNA <kbriley@barrettlawgroup.com>

Cc: Nanci-Taylor Maddux <ntmaddux@barrettlawgroup.com>; Callas, Gretchen <GCALLAS@jacksonkelly.com>; Matt Pietsch <mpietsch@grsm.com>

Subject: Sills - EC Insurance Info

Shannon / Katherine

I am writing regarding the motion to compel as it pertains to the insurance interrogatory. Footnote 6 references the production of insurance information, but says it does not contain the other information requested in the interrogatory. I looked at interrogatory no. 7 and seemed to me that what we sent contained the information sought. Can you advise what information in the interrogatory was not provided?

1. Were you a named insured, including as an additional insured, under any policy of liability insurance on the date(s) of the occurrence alleged in Plaintiffs' Complaint? If the answer to this Interrogatory is in the affirmative, identify for each such policy:
 - a. The name and address of each and every insurance carrier issuing said insurance policy or policies; [Brotherhood Mutual's name and address is on the first page]
 - b. The policy number; [this is one the first page]
 - c. The effective policy period; [this is on the first page]
 - d. The maximum liability limits for each person and each occurrence; [this information is on page 8 through 15 of the attachment]
 - e. The name and address of each and every insured under said policy or policies; and [the EC's name and address is one page 1. Related organizations are also listed on page 9].
 - f. The name and address of each and every named additional insured or certificate holder under each policy or policies. [The name and address of additional insureds

is on page 15 of 17].

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